

### **REMARKS**

Claims 33-35, 38-48, 68-69 and 71 are pending in this application. The Office Action objects to the specification and claim 66; rejects claims 60 and 77 under 35 U.S.C. §112, first paragraph; rejects claims 33, 35, 36, 45, 53, 54, 60 and 62-64 under 35 U.S.C. §112, second paragraph; rejects claims 33-43, 46-57 and 59-71 under 35 U.S.C. §102(b); and rejects claims 44, 45 and 58 under 35 U.S.C. §103(a). Applicant hereby amends claims 33, 34, 38, 44, 45, 68 and 71 and cancels claims 36, 37, 49-67 and 70. Support can be found throughout the specification as filed at, for example, at page 14, lines 12-15.

This Amendment corresponds in substance to the Amendment filed October 9, 2007, and properly identifies amendments to the claims in accordance with 37 C.F.R. 1.121(c).

#### **I. Objection to the Specification**

The Office Action objects to the specification at page 16 for containing an inaccurate statement.

Applicant amends page 16 of the specification to recite "the pH value of the liquid is pH 6 or higher and hence the zeta potential of the glass..."

For at least the foregoing reasons, the specification contains no objectionable subject matter. Reconsideration and withdrawal of the objection are earnestly solicited.

#### **II. Objection to the Claims**

The Office Action objects to claim 66 for being in improper dependent form.

Applicant cancels claim 66.

In view of the foregoing, reconsideration and withdrawal of the rejection are earnestly solicited.

#### **III. Rejections Under 35 U.S.C. §112, First Paragraph**

The Office Action rejects claims 66 and 70 under 35 U.S.C. §112, first paragraph.

Applicant hereby cancels claims 66 and 70.

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In view of the foregoing, reconsideration and withdrawal of the rejection are earnestly solicited.

**IV. Rejection Under 35 U.S.C. §112, Second Paragraph**

The Office Action rejects claims 33, 35, 36, 45, 53, 54, 59, 60 and 62-64 under 35 U.S.C. §112, second paragraph. The Office Action asserts that the foregoing claims are variously indefinite, vague, and/or contain typographical errors. Applicant amends claims 33, 34, 38, 44, 45 and 60, cancels claims 36, 37, 49-67 and 70, and respectfully traverses the rejection.

Claim 33 is amended to remove the word "essentially;" claim 45 is amended to recite "formed by a film containing MoSi and the cleaning agent contains KOH or NaOH," and claim 35 recites "but not in contact with the photomask, and the photomask." Thus, claim 35 as amended clearly recites that force is generated by the movement of the liquid caused by the relative motion of (1) a number in contrast with the liquid, but not in contrast with the photomask, and (2) the photomask. This is not a typographical error, but clearly defines the claimed invention.

Applicant cancels claims 36, 37, 49-67 and 70.

For at least the foregoing reasons, the foregoing claims are not indefinite, vague and/or contain typographic errors. Reconsideration and withdrawal of the rejection are earnestly solicited.

**V. Rejections Under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)**

The Office Action rejects claims 33-37, 41, 46, 49-57, 59-64, 66 and 67 under 35 U.S.C. §102(b) as unpatentable over Harano; rejects claims 33-40, 46-49, 50-52, 54-57, 60-62, 65-68, 70 and 71 under 35 U.S.C. §102(b) as unpatentable over Gross; and rejects claims 33, 42, 43, 68 and 69 under 35 U.S.C. §102(b) as unpatentable over Ishikawa. The Office Action also rejects claims 44, 45 and 58 under 35 U.S.C. §103(a) as unpatentable over

Harano as applied to claims 33, 54 and 56. Applicant hereby amends claims 33, 34, 38, 44, 45, 68 and 71, and cancels claims 36, 37, 49-67 and 70, and respectively traverse the rejections.

The Office Action asserts that Harano discloses a method that allows for modification of the snow grains to enable efficient cleaning of substrates. In other words, it would allegedly be easy to clean a substrate having a fine pattern structure on its surface by modifying Harano's snow grains to be smaller than the pattern on the substrate. However, instant claim 33, from which claims 34-48 depend, and instant claim 68 from which claims 69 and 71 depend, are directed to a photomask. Photomasks generally have a pattern on the level of submicrons. Although Harano discloses that the particle size of each of its snow grains as preferably set to between 10 and 200  $\mu\text{m}$ , Harano's snow grains are nowhere taught as being capable of being reduced in size to the submicron level, or that such a reduction in size is even theoretically plausible. Moreover, when a force is applied to a particle of this size, the particle would not reach the inside of a pattern and would thus insufficiently clean the photomask. Moreover, even if cleaning did occur, damage to the photomask would also occur using this technique.

Additionally, for illustrative purposes, the instant application can be distinguished from Harano in that the instant application eliminates particles of .15  $\mu\text{m}$  or less and .1  $\mu\text{m}$  or more, as described at page 17 of the specification. Harano, however, describes a technique in which it would be impossible to remove particles of .15  $\mu\text{m}$  or less by its cleaning method. Thus, the size of each grain is not limited in Harano as in the instant application. Accordingly, Harano only seeks to clean a substrate, whereas the instant application and claims are directed toward cleaning a substrate such as a photomask having a patterned structure.

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Ishikawa and Gross also do not disclose all the limitations of the claimed invention. Ishikawa is directed toward laundry detergent, and Gross a lavatory detergent. Neither teach or even suggest the requisite particle size or uniformity as in the instant claims. Thus, instant claims 33 and 68, and all claims depending therefrom, are not anticipated by Ishikawa or Gross.

For at least these reasons, the claims are patentable over the cited references. Reconsideration and withdrawal of the rejections are earnestly solicited.

#### VI. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 33-35, 38-48, 68-69 and 71 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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